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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE COLLEGE ATHLETE NIL
LITIGATION

Case No. 4:20-cv-03919 CW

DECLARATION OF SEDONA PRINCE
PURSUANT TO N.D. CAL. LOCAL RULE 79-
5(f)(3) IN SUPPORT OF THE JOINT OMNIBUS
SEALING MOTION

Judge: Hon. Judge Claudia Wilken

1 I, SEDONA PRINCE, declare as follows:

2 1. I am a plaintiff in the action titled *In re College Athlete NIL Litigation*, Case No. 4:20-
3 cv-03919 CW, filed in the U.S. District Court for the Northern District of California, Oakland
4 Division.

5 2. I submit this declaration in support of the Joint Omnibus Sealing Motion. Based on
6 personal knowledge or discussions with counsel about the matters stated herein, if called upon, I
7 could and would competently testify thereto.

8 3. I understand that the joint stipulation filed by Plaintiffs and Defendants in the above
9 captioned case sought “an order adjusting the sealing procedures for the Parties’ class certification
10 briefing papers and related documents as set forth in Local Rule 79-5.” Case No. 4:20-cv-03919-
11 CW, ECF No. 204. I further understand that on October 12, 2022, the Court granted the parties’
12 stipulation, allowing any designating party to file a statement or declaration in support of sealing, as
13 set forth in Local Rule 79-5(f)(3), fourteen days from filing the Omnibus Sealing Motion. ECF No.
14 207 (“Stipulated Sealing Order”).

15 4. I make this declaration on behalf of Plaintiffs’ and my own privacy interests in
16 response to the Stipulated Sealing Order to maintain the provisional sealing of my personal private
17 information (“Confidential Material”) that was provisionally filed under seal in support of dispositive
18 motions. The Confidential Material is narrowly tailored and consists of the following:

19 5. **Exhibit 47 to Plaintiffs’ Motion for Class Certification**, ECF No. 209-1: Exhibit 47
20 contains my response to Defendant’s First Set of Interrogatories. My response includes sensitive,
21 personal information that should remain under seal. Defendants’ First Set of Interrogatories,
22 specifically Interrogatory No. 1 and No. 7, requested I disclose actions I undertook to use my NIL
23 and to disclose “all revenues” that I earned related to my NIL. This required that I disclose private
24 and confidential individual contract terms and compensation value, as well as the identity of the
25 contracting parties.

26 6. **Defendants’ Expert Catherine Tucker’s Expert Report**, ECF No. 254-1: In
27 paragraph 223(a) of Dr. Tucker’s report she includes sensitive contractual terms including
28 compensation and contracting party names of personal third-party NIL deals I have obtained and

1 disclosed in the interests of serving the class. Similarly, in paragraph 302(b) of her report Dr. Tucker
2 discusses my total financial earnings from third-party NIL deals which is private and sensitive
3 information.

4 7. Sealing this Confidential Material is consistent with the confidentiality protections of
5 the Second Stipulation and Order Supplementing and Amending Protective Order Regarding Highly
6 Confidential – Counsel Only and Conference Strictly Confidential Information. ECF No. 181.

7 8. Disclosure of the Confidential Material identified in paragraphs 5 and 6 may impact
8 my business relationships with sponsoring entities and inhibit my ability to negotiate contractual
9 terms with parties in the future. As such, sealing this material is necessary to protect my current and
10 future personal, financial interests.

11 I declare under penalty of perjury under the laws of the United States that the foregoing is
12 true and correct. Executed this 29th day of September 2023 at Fort Worth, Texas.

13 DocuSigned by:
14 *Sedona Prince*
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16 SEDONA PRINCE
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